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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101
August 3, 1995

In Reply
Refer To: HW-113

Mr. Robert L. Geddes
Senior Environmental Engineer
Monsanto Chemical Company
P.O. Box 816
Soda Springs, ID 83276

Subject: Comments on the Responses to Phase II RI Comments

Dear Mr. Geddes:

This letter is in response to Monsanto's May 30, 1995, Responses to Phase II RI Comments for the Monsanto Elemental Phosphorus Plant, Soda Springs, Idaho. While most of the comment responses satisfactorily addressed United States Environmental Protection Agency (EPA) comments, several need additional clarification or modification. The enclosed review identifies only those comment responses that may not be acceptable to EPA. The review comments identify the Monsanto comment responses by the original EPA comment number.

The one issue considered significant, as we have discussed, is the issue of contaminated groundwater and Monsanto's response to EPA comment 31. Comment 31 must still be addressed in the RI.

Many of the responses accepted the comments and stated the remedial investigation (RI) report will be revised to address EPA concerns. Pending review of these RI revisions, the comment responses were considered acceptable.

A written response to this letter is due to EPA by August 24, 1995. Please review the enclosed comments and then call me or schedule a conference call prior to the 24th to discuss how you propose to resolve the comments and how soon after that date Monsanto proposes to submit the revised Phase II RI (or inserts).

Sincerely,

Timothy H. Brincefield
Superfund Site Manager

Enclosure

cc: Gordon Brown, IDHW
David Banton, Golder Associates, Inc.

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Enclosure

Comments on Monsanto's 5/30/95 Responses to Phase II RI Comments, Monsanto Elemental Phosphorus Plant, Soda Springs, Idaho

1. General Comment
Comment references EPA Comment 2

The proposed paragraph describing the purpose and applications of the groundwater modeling should include a brief discussion of the limitations of the model. The discussion should address the limitations of the model for predicting fate and transport of site constituents in the vicinity of the site and the uncertainties associated with the predictions.

2. Page 18, Section 2.1.2, Paragraph 2
Comment references EPA Comment 9

The comment response identifies sample collection locations as being the material surface. Samples collected from the material surface may or may not be representative of the material available for transport through the air pathway. A portion of the fine-grained material may have already migrated from the material surface prior to sampling. Samples collected from within the material may be more representative of the grain-size distribution of the material available for transport.

3. Page 66, Section 3.7.1.2, Paragraph 3
Comment references EPA Comment 16

The proposed revision to the text on Page 79 does not resolve the issue raised in the comment. The comment points out that the discussion on Page 66 suggests the source for water discharged at Ledger Spring is the Blackfoot Lava Field. As with the original text, the proposed revision indicates the source of the discharged water is in the mountains east of the lava field. An interpretation consistent with both the travertine deposit and fresh water quality data (Page 66) and oxygen-18 and deuterium data (Page 79) rationale should be provided to identify the source of spring discharge water.

4. Page 112, Section 4.6.1, Paragraph 3
Comment references EPA Comment 29

Comment response does not satisfy the EPA comments. The comment references the second sentence in the paragraph, which concludes that the aquifers are separated into flow regions with little to no hydraulic continuity. As indicated in the response to EPA Comment 20, insufficient data exist to form such a definite conclusion. The text should be consistent.

5. Page 115, Section 4.6.1.2, Paragraph 3
Comment references EPA Comment 30

Comment response does not fully satisfy the EPA comment.

Beryllium was detected in groundwater at concentrations above the upper tolerance level (Page 114, Table 4-21). Beryllium was eliminated because it was detected sporadically prior to 1992 and has not been detected since 1992. A longer time interval without beryllium detection appears necessary for this rationale to be acceptable.

6. Page 116, Section 4.6.1.3, Paragraph 3
Comment references EPA Comment 31

Comment response does not satisfy the EPA comment, which still must be addressed. CERCLA and the NCP require that potential as well as actual drinking water sources be addressed. The rationale for considering only those constituents of interest from the UBZ-2 groundwater region does not appear sufficiently conservative. The exposure potential for site constituents detected in other groundwater regions is not sufficiently known to support the rationale, given the complexity of the site hydrogeology. The RI must acknowledge and address all constituents of concern in all groundwater zones, including those beneath the site.

7. Pages 118 and 123, Section 4.6.2, Paragraphs 1 and 5 (Page 118) and 5 (Page 123)
Comment references EPA Comment 32

The comment response states that an explanation for the observed water quality trends is not available. The RI offers the pulse-type source explanation as a possible scenario. Since no data exist to support the pulse-type source scenario, the discussion of that scenario should be deleted from the RI.